

Second Set**TERESA JORDAN****3152 SHAD COURT****SIMI VALLEY, CA 93063****TELEPHONE NO. (805) 522-5016**

TO: Attn: Mr. Paul Dabbs, Chief
Water Resources Evaluation
Statewide Water Planning Branch
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

FAX NO.: (916) 651-9289

DATE: July 31, 2008

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RE: South Coast Hydrologic Region
Draft -- August 01, 2008 Public
Comments Deadline.

3152 Shad Court
Simi Valley, CA 93063
July 31, 2008

Attn: Mr. Paul Dabbs, Chief
Water Resources Evaluation Section
Statewide Water Planning Branch
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Re: South Coast Hydrologic Region Draft--August 01, 2008
Public Comments Deadline.

Dear Mr. Dabbs:

This letter is a follow-up to my July 30, 2008 letter, and a continuation of my comments on the Initial Draft since the Working Draft for this region was not posted.

Mr. Dabbs, please note that this morning while searching for an item related to another issue, I came across a telephone conversation I had on December 11, 2000 with Metropolitan Water District (MWD) staff member, Mr. Brandon Goshi (213) 217-7384 in which he apologized for not getting back to me on my November 28, 2000 letter on its 2000 Urban Water Management Plan (UWMP) Update. He responded somewhat to my 8 pages letter. He informed me that some of my comments had been incorporated. He did not say which. So, I stand corrected on my July 30, 2008 letter comment #9 on the MWD's non-response. And, state now for the record that a written response was not forwarded. I still do not have any confidence in MWD since the District may change the way that water supply quantities are to be shared with its member agencies--original communities who contributed funds in the beginning for the water system are being pitted against other communities who did not, but need more water. This information must be included in the "Looking to the Future" section (Pages 5-13 to 5-16).

#21 - It is stated on Page 5-15, middle of page, that
"As part of a regional strategy to improve water supply reliability, several agreements with water districts in the Central Valley are providing

groundwater storage for the South Coast region ...". Include under the "Looking to the Future" section how the Central Valley Flood Control Board(formerly The Reclamation Board) and DWR's implementation of proposed AB 1147 regulations impacts or aids this hydrologic region.

- #22 - It is stated in the second bullet point, on Page 5-15, that "Arvin-Edison Water Storage Program. MWD and the Arvin-Edison Water Storage District have developed a program that allows Metropolitan to store water in the groundwater basin in the Water Storage District's service area in Kern County. Over the next 25 to 30 years, this groundwater storage program will provide average daily dry-year withdrawals of about 70,000 acre-feet annually." A July 21, 2008 Ventura County Star article from wire reports, "Edison may hike rates for electricity", states "Residents who rely on Southern California Edison for power could face rate hikes of 30 percent next year", and "Edison has until December to tell the California Public Utilities Commission exactly what the higher rates would be."

QUESTION: Does the electrical supply rate hike impact this hydrologic region's water supply reliability? If it does, this information must be included under the "Looking to the Future" section.

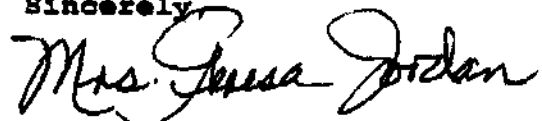
- #23 - The Federal Reserve of San Francisco President and CEO, Janet Yellen,'s July 15, 2008 FRBSF Conference speech states "foreclosures has grown dramatically in a very short time". One of this Federal Reserve District's "hotspots" is "in California's Central Valley". She also stated "it is hard to ignore the wave of foreclosures and REOs in California's Central Valley and Inland Empire". The mortgage and foreclosure crisis must be included under the "Looking to the Future" section since no one knows what is the long-term impact to local government agencies. Ms. Yellen stated that California went from being "among the lowest foreclosure rates in the country" in 2006, and "by the quarter of this

year" it was "among the top five states in the nation in overall foreclosure rates."

- #24 - Under the "Looking to the Future" section, include text to the effect of how the DWR's FloodSAFE Program Strategic Plan relates to the Southern Coast Hydrologic Region.
- #25 - Page 5-14, to the paragraph that begins with "Another future water supply option...", add the words "Groundwater Storage" in bold as was done for the paragraph with "Desalination" standing out in front of the text.
- #26 - Page 5-14, to the last paragraph, in bold have the words "Flood Control Reservoirs" stand out as was done with "Desalination", and then change the first sentence to read "These facilities are now being evaluated for their potential to provide some water supply..."
- #27 - Page 5-15, to the paragraph that begins with "The Water Augmentation Study" in bold have the word "Studies" stand out as was done with "Desalination" on Page 5-14.
- #28 - Page 5-15, to the paragraph that begins with "As part of a region strategy..." in bold have the word "Agreements" stand out as was done with "Desalination" on Page 5-14.
- #29 - Page 5-15, to the paragraph that begins with "Other potential management strategies" in bold have the word "Strategies" stand out as was done with "Desalination" on Page 5-14.

Mr. Dabbs, I am opposed to changing the Prop 218 two-thirds voting requirement for flood control projects. Enclosed is a copy of my letter to Mr. Don Bentley, MWD; Draft 2000 Regional Urban Water Management Plan(8 pages).

Sincerely,



Mrs. Teresa Jordan

3152 Shad Court
Simi Valley, CA 93063
November 28, 2000

Mr. Don Bentley
Metropolitan Water District
P.O. Box 54153
Los Angeles, CA 90054-0153

Re: Draft 2000 Regional Urban Water Management Plan.

Dear Mr. Bentley:

Since this is my first time dealing with MWD's Plan, I am not taking a pro or con stand on the document. Though I have not been familiar with MWD's Urban Plans, my involvement for the past 12 years with numerous City of Simi Valley development projects, local to federal government level stormwater quality management programs and plans, Ventura County communities Consolidated Plans and Housing Elements, and the City of Simi Valley's 1996 Urban Water Management Plan, as well as various other activities have come in handy in putting the following observations, suggestions, and questions forward on the "Draft".

COMMENTS

- #1 - MWD's Regional Urban Water Management Plan Draft is an excellent document. It is well written.
- #2 - Though the document is a "draft" the color and fold out pages were very helpful.
- #3 - Will the final Plan have a November adoption date, instead of the October "draft" date?
- #4 - Does MWD put together a Water Master Plan? If so, when was it last approved, and when will it be updated?
- #5 - The 67% for the Ventura County area in Table I-1 seems rather low compared to the difference between 500,000 and 742,000. (Page I-3)
- #6 - Did MWD provide 45 and 60 percent of the municipal, industrial and agricultural water use in its 5,200 square mile service area during 2000

or throughout MWD's history? (Page I-3)

Does the percentage differ between dry and wet time spans in one year, or throughout its history?

- #7 - If there are 27 member agencies and MWD and the Board will be reduced to 37, and with the merger between Orange County and Coastal Municipal Water Districts, who will make up the 37 in 2001?
(Page I-5)

Will the merger of Orange County and Coastal Municipal Water District's lead to only one representative on the 37 member board?

- #8 - Include the "Source" on Figure I-4--Average Annual Population Growth Rate in Metropolitan's Service Area. (Page I-8)

- #9 - It is unfortunate that the Integrated Resources Plan (IRP) is being updated after the RUWMP is sent to the State since some of the goals could be modified, or deleted that would impact the Urban Plans for MWD, its member agencies and the many purveyors. (Page II-1)

Will the IRP update be an open and participatory process that will include the general public?

I kindly request a copy of the IRP draft when it is updated.

- #10 - Is "iterative process" in the third paragraph, first sentence supposed to be "interactive"?
(Page II-3)

- #11 - Please note that as far as the "Local Emphasis Mix" is concerned, with regards to the Calleguas Municipal Water District and City of Simi Valley Joint Well Water project there have been no public hearings, and an EIS/EIR has not been done for the proposal to mix groundwater with potable water supply, nor has the City of Simi Valley done a follow-up on its February 1984 Groundwater Demineralization Study for Alternative SWP Sources, nor has the City Council to date adopted a Stormwater Quality Management Ordinance per the Countywide NPDES Permit, nor has it updated its 1986 Water Master Plan!

- #12 - Compared to all the other MWD's member agencies, is the potable water rate higher for Calleguas, and City of Simi Valley Waterworks District #8? If so, is it because this service area relies only on MWD's supply?

[At the January 29, 1998 Agriculture Policy Working Group (APWG) Ronald Reagan Presidential Library and Museum town hall meeting one of the participants stated that Ventura County water supply is the costliest.]

- #13 - Is MWD's water supply to Calleguas Municipal Water District carried through one or two pipelines before the railroad tunnel in the City of Chatsworth, or in the railroad tunnel, or in the Santa Susana Knolls area? (Page I-4)
- #14 - Did MWD rely on the 1999 population numbers from other sources because the U.S. Census figures are not out?

Which figures came from the California Department of Finance, the County Assessor's Office and Metropolitan-developed statistics?

Were all Counties Assessors offices contacted?
(Page I-2)

Please note that Calleguas Municipal Water District's Draft 2000 Urban Water Management Plan states MWD's population at 16 million currently instead of your Plan's 16.6 million and 17 million numbers. It also states that in 2010 there will be a population of over 20 million. MWD's 215,000 people per year figure would put the population for 2010 around the 19+ million mark. (Pages I-5, and A.1-2)

- #15 - Figure I-2, give the "Source" for the population information. (Page I-7)
- #16 - Figure I-3, give the "Source" for the population information. (Page I-8)
- #17 - Why does Figure I-4 not include deliveries to Desert Water Agency and Coachella Valley Water District?

- #18 - Why is the "wheeling" to Castaic Lake Water Agency and deliveries to storage outside of Metropolitan's service area excluded from Figure I-5? (Page I-9)
- #19 - Since Calleguas Municipal Water District does not cover all of Ventura County are the population numbers, and municipal and industrial per capita water use figures reflective of this situation, or is the entire county population and all businesses lumped together? (Pages I-10, A.1-8, A.1-9, A.1-10, A.1-11, and A.1-12)
- #20 - Since the IRP is going to be updated, will the WSDM be updated soon?
- #21 - Why is Page II-9 mostly blank?
- #22 - While MWD and its member agencies are looking for various ways to conserve and store water in order to deal with emergency situations disrupting the SWP, the LA Aqueduct, and Colorado River supplies, I didn't read anything about asking people in the service area to keep a certain of bottled water on hand! Is this not something that the RUWMP is supposed to deal with in its public information section?
- #23 - Does MWD get involved in commercial and industrial planning at some level community level?

The City of Simi Valley for the past 2 years has been allowing the addition of water fountains in commercial development, and has implemented a very aggressive program to landscape road medians throughout the City, yet MWD and its member agencies are worried over having enough drinking water supply and working desperately to conserve 1 million acre-feet per year by 2020. Is this type of community planning taking place throughout the MWD service area?

Has MWD and its member agencies considered calling for a cutback in swimming pool construction?

- #24 - Has MWD analyzed the effect of disruption on all 3 imported water supplies at one given time from a major catastrophe? (Page II-17)

- #25 - Is MWD referring to the "toilet-to-tap" program in its and its member agencies' recycling efforts?
- #26 - Does the conservation program take into account that many times the ultra-low flow toilets are flushed twice by people?
- #27 - I was shocked to read that not every retail agency has become a BMP-related conservation signatory! (Page A.1-5)
- #28 - Does MWD have a custom-tailored three-way contract with the Boeing Rocketdyne Santa Susana Field Laboratory specifying water efficiency performance requirements since its groundwater wells have been contaminated? (Page III-11)

Does the SSFL have a water conservation plan?

- #29 - How does MWD ensure that the school education programs are being disseminated each year? (Page III-15)

Are these programs integrated into the schools science classes?

Are these educational programs geared only to the public school system, or are private schools also included?

Why did MWD discontinue the Water Hunt and In Concert with the Environment programs--cost, lack of teachers, lack of interest?

Does the School Education monetary amount in the CUWCC-Wholesale Water Agency Annual Report for 1997-1998 cover the In Concert with the Environment program? How many months and kids? (Page 6)

Does the School Education monetary amount in the CUWCC-Wholesale Water Agency Annual Report for 1998-1999 reflect additional supplies, or hike in material costs, or expansion of the educational programs mentioned on Page III-14? (Page 6)

- #30 - Include the money expended by MWD under Table III-6. (Page III-16)

#31 - I am opposed to MWD not distinguishing between water recycling and groundwater recovery programs! (Page III-17)

#32 - Include a "Key" for Figure III-4. (Page III-19)

#33 - For Table III-9 include the year the contract was approved. (Page III-25)

Only 43 of the 53 projects are listed. List the other 10.

Why is not all of the information complete?

For what year did South Laguna Reclamation Expansion yield 54 af for \$8,239, or was this an existing yield before the contract was signed? Since MWD has a contract with Century Reclamation and it has produced 2,859 of the 5,500 af why is the total yield blank along with the funding allocation?

Same question for Glendale Brand Park Reclaimed Water.

#34 - The information relative to the Industrial Users, first paragraph, second and last sentences, seems contradictory. (Page III-27)

#35 - Why do regional and statewide planning efforts with regards to recycled water require voluntary and not mandatory cooperation?

#36 - I am opposed to weakening regulation of recycled and groundwater supplies!

Without a citizen participation plan and lack of EIS/EIRs MWD and its member agencies will have problems convincing people to accept recycled and groundwater projects in light of the fact that there are no "uniform criteria for groundwater recharge applications", and the state regulatory agencies review and determine requirements for recharge projects on a "case-by-case basis", and CDHS is required in many instances to "make interpretations regarding Title 22" just to make these supplies cost-effective.

The goals for recycling and groundwater recovery must not be combined!

- #37 - As far as "public health" is concerned, is there a "level of risk" mandated by the State, MWD and its member agencies?
- #38 - Who are the agencies in MWD's service area that provide 18,000 af per year of degraded water without any financial help from MWD? (Pg III-32)
- #39 - Include a section for the year that the contract was signed for Table III-11 since most of the groundwater recovery projects have not yielded any AFYs and MWD has not contributed any financial help to date. (Page III-33)
- #40 - Why was Raymond left out of Table III-12? (Page III-35)
- #41 - With regards to the MWD/Calleguas Municipal Water District's Demonstration local storage Programs, how much water was stored and where in 1993 and 1994? (Page III-38)
- #42 - Was an EIS/EIR undertaken for the MWD/Calleguas Municipal Water District's 1995 Contractual Storage for the 30 wells in the North Las Posas Groundwater Basin?
- #43 - Why do the Foothill and Pasadena agreement not specify "maximum account levels"? (Page III-39)
- #44 - Please note that Table III-16 lists 285,000 af for "Contractual Storage", yet Table III-15 states that the "Maximum Account Level" is 210,000 af. (Page III-41)

Where do the additional 75,000 af come from?
- #45 - Why have Bay-Delta levees not been strengthened and properly maintained--are in private lands, State not have funding, etc? (Page III-65)

How many levees are there, and how many are impacted from weakness and poor maintenance practices?
- #46 - Why are VOCs not included under "Local salinity management actions to protect groundwater and recycled water supplies"? (Page IV-2)
- #47 - Provide a "Key" for Figure IV-1. (Page IV-5)

8

- #48 - How is "ozone" used in disinfecting bromide and TOCs? (Page IV-8)

Doesn't this use of "ozone" lead to more ozone in the air, thus affecting air quality?

- #49 - Do any of the chemicals of concern to MWD and its member agencies cause Autism, low birth weight, Anorexia?
- #50 - With regards to Local Water Supplies, is MWD using "reclaimed" instead of "recycled"? (Page A.2-1)
- #51 - Which are the portions of the Ventura County Basins that the Fox Canyon Groundwater Management Agency manages? (Page A.2-4)
- Why did MWD not mention who manages the other portion(s) of the Ventura County Basins?
- #52 - Include a "Key" for Figure A.2-2. (Page A.2-5)
- #53 - As part of MWD's Regional Urban Water Management Plan's Act requirement for "Public Information" include information about your Website!
- #54 - Appendix A.5 - Public Involvement must not be left blank especially if MWD and its member agencies are hoping for public acceptance of recycled and groundwater projects!
- #55 - Why is the League of Women Voters listed on the CUWCC Annual Report? (Page 1)
- #56 - Does MWD get to review any of its member agencies Draft Urban Water Management Plans to make sure that the summaries of the various supply lines and the problems inherent with them, etc. are exactly what MWD states in its Plan?

Mr. Bentley, I thank MWD for making available a copy of the Draft 2000 Regional Urban Water Management Plan.

Sincerely,

Mrs. Teresa Jordan
(805) 522-5016